

V.E.,

*Plaintiff,*

*v.*

UNIVERSITY OF MARYLAND  
BALTIMORE COUNTY,  
MARYLAND,

*Defendant.*

\* IN THE UNITED STATES  
\*  
\* DISTRICT COURT  
\*  
\* FOR THE  
\*  
\* DISTRICT OF MARYLAND  
\*  
\* (Northern Division)  
\*  
\*  
\* Case No.: 22-cv-02338  
\*  
\*

\* \* \* \* \*

**V.E.’S MOTION TO ALTER OF AMEND DISMISSAL WITH PREJUDICE  
OR, ALTERNATIVELY, FOR LEAVE TO AMEND**

Plaintiff, V.E. (hereinafter referred to as “Plaintiff” or “V.E.”), by and through her undersigned attorneys, Rignal Baldwin, V, of Baldwin | Seraina, Jeffrey P. Bowman, Lucas Van Deusen, and BOWMAN JARASHOW LAW LLC, pursuant to Fed. R. Civ. Pro. 59(e) and Local Rule 105, hereby files this Motion to Alter or Amend this Court’s April 21, 2023, dismissal with prejudice (the “Dismissal”) or, alternatively, for Leave to Amend V.E.’s Amended Complaint, filed on December 19, 2022 (hereinafter, V.E.’s “Motion”). The grounds for V.E.’s Motion are set forth in the accompanying memorandum which is incorporated herein by reference.

WHEREFORE, Plaintiff, V.E., respectfully requests that this Honorable Court:

- A. Enter an Order vacating the Court’s April 21, 2023, dismissal with prejudice, and that the above-captioned matter shall proceed in due course; and, alternatively,
- B. Enter an Order granting Plaintiff, V.E., leave to amend her Amended Complaint, filed on December 19, 2022, to include those facts which are necessary to resolve statute of limitations; and

- C. Enter an Order granting such other and further relief as this Court deems just and proper.

Date: May 19, 2023

Respectfully Submitted,

/s/ Lucas Van Deusen

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*Counsel for Plaintiff, V.E.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on or about May 19, 2023, a copy of the foregoing was e-filed and served via e-filing, e-mail, and / or first-class mail, postage prepaid, to:

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/s/ Lucas Van Deusen

Lucas Van Deusen (Bar # 30274)